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RAYMOND J. KIMBALL

May 23, 1996

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908-563-2700

Federal Communications Commission
Waiver Requests
P.O. Box 358300
Pittsburgh, PA 15251-5300

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Re: Rule Waiver - Timely Action FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

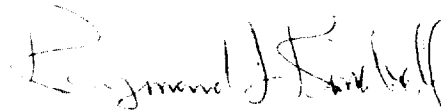
Dear Sir/Madam:

Enclosed on behalf of Pinpoint Communication Networks, Inc., Mobilevision, LP, Uniplex Corporation, and Roger D. Linguist, please find an original and one copy of Joint Motion for Rule Waiver.

Also enclosed is FCC Form 159 and a check in the amount of \$125.00 (one hundred twenty-five dollars) to cover the filing fee. Additionally, we have enclosed a copy of this filing to be date stamped and returned to this office in the enclosed self-addressed, postage paid envelope.

Should you have any questions concerning this filing, kindly communicate with the undersigned.

Sincerely,



Raymond J. Kimball

Enclosures

FEDERAL COMMUNICATIONS COMMISSION
FCC REMITTANCE ADVICE

Approved by OMB
 3060-0589
 Expires 2/28/97

PAGE NO. 1 OF 1

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ITEM #1 INFORMATION

(11A) NAME OF APPLICANT, LICENSEE, REGULATEE, OR DEBTOR

Pinpoint Communication Networks, Inc.

FCC USE ONLY

(12A) FCC CALL SIGN/OTHER ID

WPCY395

(13A) ZIP CODE

75240

(14A) PAYMENT TYPE CODE

P D W M

(15A) QUANTITY

1

(16A) FEE DUE FOR
 PAYMENT TYPE CODE
 IN BLOCK 14
 \$ 125.00

(17A) FCC CODE 1

(18A) FCC CODE 2

(19A) ADDRESS LINE NO. 1

(20A) ADDRESS LINE NO. 2

(21A) CITY/STATE OR COUNTRY CODE

ITEM #2 INFORMATION

(11B) NAME OF APPLICANT, LICENSEE, REGULATEE, OR DEBTOR

FCC USE ONLY

(12B) FCC CALL SIGN/OTHER ID

(13B) ZIP CODE

(14B) PAYMENT TYPE CODE

(15B) QUANTITY

(16B) FEE DUE FOR
 PAYMENT TYPE CODE
 IN BLOCK 14
 \$

(17B) FCC CODE 1

(18B) FCC CODE 2

(19B) ADDRESS LINE NO. 1

(20B) ADDRESS LINE NO. 2

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☐ Mastercard

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☐ ☐

☐ Visa

Month Year

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TO
THE
ORDER
OF

Federal Communications Commission
Feeable Correspondence
P.O. Box 358300
Pittsburgh, PA 15251-5300

⑈002260⑈ ⑆254070116⑆

⑈6655 8646⑈

MP

Before the
FEDERAL COMMUNICATIONS COMMISSION
1919 M St NW
Washington, DC 20554

In re:

PINPOINT COMMUNICATION)	WPCY395, et.al.
NETWORKS, INC)	
)	
MOBILEVISION L.P.)	WNWC592, et.al.
)	
UNIPLEX CORPORATION)	WPEF613, et.al.
)	
ROGER D. LINQUIST)	WPFM450, et.al.
)	
Licenses for New Facilities)	
in the Multilateration)	
Location Monitoring Service)	
(LMS))	

To: Chief, Wireless Telecommunications Bureau

WAIVER - TIMELY ACTION REQUESTED

JOINT MOTION FOR RULE WAIVER

Pinpoint Communication Networks, Inc. (Pinpoint),
Mobilevision, L.P., (Mobilevision), Uniplex Corporation
(Uniplex), and Roger D. Linquist (Linquist), through counsel,
pursuant to sections 90.153 and 1.931 of the Federal
Communications Commission ("Commission") Rules, hereby jointly
request a waiver of Section 90.363(d), as recently amended, to
extend the time by 60 days, from September 1, 1996, to and
including November 1, 1996, to construct and place in operation
the LMS licenses recently issued in late March, 1996, listed in
Attachment A.

I. Background

On February 5, 1995, the Commission released its Report and Order establishing a new LMS service using a new frequency plan.^{1/} The Commission required existing AVM licensees to modify their applications by May, 22, 1995 to conform to the new plan, and to place their licenses in operation by April 1, 1996.^{2/} This plan anticipated that the licensees would have approximately one year to construct their system once new licenses were issued.

However, new licenses did not issue. There were a number of critical unresolved issues taken up on reconsideration which substantially delayed the issuance of the licenses and prevented commencement of construction. The two most critical issues were the emission mask requirements and Part 15 testing requirements.

The emission mask designated by the Commission in the LMS Order rendered the licensee's proposed systems inoperable. Until the licensees knew the Commission's answer on reconsideration, the licensees could not, through due diligence, locate investors willing to invest in an inoperable system.

^{1/} Report and Order in PR Docket 93-61, 10 FCC Rcd 4695 (1995). (Hereinafter "LMS Order")

^{2/} 47 CFR § 90.353(d)

Then, on March 21, 1996, just ten (10) days before the deadline for construction, the Commission issued an Order on Reconsideration^{3/}, which set a new emission mask requirement and clarified other matters. However, instead of the one year construction requirement set out in the LMS Order, the Reconsideration Order only provided five months, i.e., until September 1, 1996, for grandfathered licensees to construct their systems under the clarified rules. The Commission observed that circumstances beyond the control of the licensees and the Commission delayed the Reconsideration Order and the issuance of the licenses, and not any circumstance attributable to the licensees.^{4/}

The licenses were not issued until the Reconsideration Order was released, and were not generally received by the licensees until April 4, 1996. The licensees could not construct prior to issuance of the modified licenses, and prior to receiving the new emission mask requirements in the Reconsideration. The emission mask change was not a minor "tweak" to system design. It profoundly affected system design, since the proposed system designs of the various licensees would

^{3/} Order on Reconsideration PR Docket No. 93-61, (FCC 96-115) (released March 21, 1996) (Hereinafter, Reconsideration Order)

^{4/} Id., slip op. at 4, para 8:

...the release of this Order on Reconsideration has been delayed because the Commission was closed due to the government shutdown that began in mid-December and due to the inclement weather that immediately followed.

not work with the old standard. The licensees, after March 21, had to find a new way to incorporate the new requirements into their designs.

II. Proposed Merger

The parties, after significant discussions and negotiations following release of the Reconsideration Order, are contemplating the merger of their licenses and operations. First, the parties determined that, individually, they would not be able to construct a commercially viable LMS system, but that they could do so through merger. Second, merging and sharing technology, resources, staff, and knowledge permitted economies of scale, and was attractive to potential investors. Third, potential technical interference problems between potentially incompatible LMS technologies could be avoided through joint system design; in this way the industry would be solving a difficult problem the Commission left to the marketplace. See Section 90.353(e). Fourth, a company would be created with sufficient strength and commercial viability, without subsidization from other services,, once the grandfathered system was built, to participate in the forthcoming auctions, and attract further capital investment for MTA expansion.

III. Investor Interests

The parties, jointly, have invested over \$80 million in system engineering and design, administrative overhead, regulatory, and legal costs. All of the licensees worked diligently during 1995-1996 to obtain additional capital

investment commitments. However, without the Reconsideration Order the licensees could not ensure potential investors that the system design would work. Investors decided there was too much regulatory uncertainty, and that investment decisions must await the Reconsideration Order.

Without grant of this motion, it is likely this \$80 million would become stranded investment. Following the delays in releasing the Reconsideration Order, Pinpoint entered into Chapter 11 Bankruptcy. The delays have also placed significant financial strain on the remaining licensees jointly filing this motion. However, in discussions and negotiations following the release of the Reconsideration Order, an investor/management group, which is also a major creditor of Pinpoint, has come forward and has indicated a willingness to take the lead in financing construction, on two conditions:

1. That the parties merge their resources and licenses;
2. That a reasonable period of time be available to construct the proposed system.

Eighty percent of the new investment necessary for system construction costs must be made at the front end of the construction process, i.e., now, in May and June, 1996. The licensees estimate the average cost to construct each base station initially is \$12,000, all but \$2,500 of which has to be committed now, prior to construction. However, five months

simply is insufficient time to assure construction and initiation of operation of the complex multi-city LMS system; the present construction deadline places this initial investment entirely at risk if construction cannot be completed by September 1, 1996. The steps necessary to accomplish construction are as follows:

1. Complete the merger agreements;
2. File and obtain approval to assign licenses to the merged entity;^{5/}
3. Complete system design, based on Reconsideration;
4. Place parts, equipment, and software orders;
5. Design software components;
6. Manufacture prototype;
7. Submit to FCC for type acceptance (40 days);
8. Manufacture hardware;
9. Assemble base stations, network controllers, mobile radios;
10. Negotiate and finalize tower leases;^{6/}

^{5/} The licensees do not anticipate that this step would delay the construction time table , which will proceed through the licensee's joint efforts pending license assignment.

^{6/} Finalizing tower leases apparently has been the subject of some discussion within the Commission, i.e., that tower leases could have been entered into before the reconsideration order was released. This is neither Commission law, or custom and practice within the industry. The Commission only requires that an applicant have "reasonable assurance of tower site availability." See, e.g., 47 CFR § 22.115 (a)(1). Applicants are not required to enter into expensive, multi-year tower leases prior to license issuance, and the reasons are readily apparent. In this instance, as much as a year's rent on over 250 tower sites, at an average cost of \$500 per month per site, i.e., \$1,500,000 would have been required. The reasonable custom and practice in the
(continued...)

11. Transport assembled equipment to sites in 15-16 cities;
12. Construct the system;
13. Test the system;
14. Conduct Part 15 testing;
15. Place System in Operation;

Using the combined staff and resources of the merged licensees, the licensees have concluded, after substantial joint discussions with their engineers, equipment manufacturers, and parts suppliers, that the September 1 deadline permits Zero (0) tolerance for any, including the slightest, delay, in the completion of any one of the steps outlined above. While it might be possible to complete construction of a few sites by September 1, 1996, it appears that it would be impossible to complete placing the entire 15 to 16 city operation into service by that date, in order to achieve a commercially viable system which to which the investors would be willing to commit their resources. The investors are unwilling to invest with the risk that less than commercially viable systems can be constructed in the short grandfathering construction time frame, given the unique circumstances attending this construction.

In order to demonstrate its good faith efforts to diligently construct, and in order to minimize any disruption, the licensees are requesting only a sixty-day (60) extension of

^{6/}(...continued)

industry is that such leases generally are entered into after the licenses are issued, for obvious reasons of economy and preserving resources.

time, to and including November 1, 1996. It is noteworthy that no other Commission licensee receives less time to construct from the date of issuance of its license. Single site, single channel General Category licensees under Part 90.155 get 8 months to construct; Single-site, five (5) channel trunked SMR systems get 12 months to construct. See Section 90.167. Indeed, other LMS systems get a minimum of 12 months to construct one BTA. See Section 90.155(d). Television stations get 18 months to construct, with reasonable extensions. The licensees know of no similar requirement that a multi-channel, multi-site system²⁷ employing new technology and custom designed equipment must construct and operate, in spectrum already substantially occupied by other licensees, within 5 months of the issuance of the licenses and final rules. The present construction requirement is contrary to the weight of Commission experience and policies on the construction of complex facilities, and is shorter than any known time frame existing in the rules for constructing much simpler systems using "off the shelf" technology and equipment.

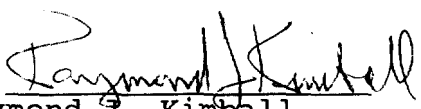
Under the circumstances, this case presents sufficient unique factors, beyond the control of the licensee, and in which, under similar circumstances, extensions of time to construct have been waived and extended, for even greater periods than those

²⁷ The LMS rules require a minimum of three (3) transmitter sites to construct a grandfathered multilateration LMS system in any market. See LMS Report, 10 FCC RCD at 4728, para 62.

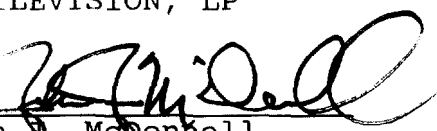
here asked for. See, e.g., Daniel R. Goodman, Receiver, 78 RR2d 1017(1995).

Wherefore, the Premises considered, Pinpoint, Mobilevision, Uniplex and Linquist hereby jointly and respectfully request a waiver of Section 90.363(d) to extend construction of their facilities to and including November 1, 1996.

PINPOINT COMMUNICATION
NETWORKS, INC.

By 
Raymond S. Kimball
Its Counsel

MOBILEVISION, LP

By 
John S. McMonnell
Its Counsel

UNIPLEX, INC.

By _____

ROGER D. LINQUIST

By _____

ROSS & HARDIES

5-23-1996 14:36

PAGE 12/12

RightFAX

construction of their facilities to and including November 1,
1996.

PINPOINT COMMUNICATION
NETWORKS, INC.

By _____
Raymond J. Kimball
Its Counsel

MOBILEVISION, LP

By _____
John J. McDonnell
Its Counsel

UNIPLEX, INC.

By Maail Bryan, President

ROGER D. LINQUIST

By _____

construction of their facilities to and including November 1,
1996.

PINPOINT COMMUNICATION
NETWORKS, INC.

By _____
Raymond J. Kimball
Its Counsel

MOBILEVISION, LP

By _____
John J. McDonnell
Its Counsel

UNIPLEX, INC.

By _____

ROGER D. LINQUIST

By *Roger D. Linquist*

ATTACHMENT A**Pinpoint Communication Networks, Inc.
Licenses**

<u>Call Sign</u>	<u>Location</u>	<u>Grant Date</u>	<u>Exp. Date</u>
WPDY971	Washington, D.C.	3/22/96	3/22/01
WPCY331	Dallas, TX	3/23/96	3/23/01
WPCY391	Detroit, MI	3/23/96	3/23/01
WPCY395	Atlanta, GA	3/26/96	3/26/01
WPCY399	Baltimore, MD	3/26/96	3/26/01
WPDW647	Deerfield Beach, FL	3/25/96	3/25/01
WPCY403	Houston, TX	3/23/96	3/23/01
WPDW648	Boston, MA	3/22/96	3/22/01
WPDW650	St. Louis, MO	3/23/96	3/23/01
WP EE514	Phoenix, AZ	3/26/96	3/26/01
WPDY970	Philadelphia, PA	3/23/96	3/23/01
WPDY969	San Francisco, CA	3/26/96	3/26/01
WPDY972	Palo Alto, CA	3/26/96	3/26/01
WPF E592	Pontana, CA	3/26/96	3/26/01
WPDW649	San Diego, CA	3/23/96	3/23/01
WPF E286	Los Angeles, CA	3/26/96	3/26/01
WPF D892	Riverside, CA	3/26/96	3/26/01
WPDW651	Miami, FL	3/23/96	3/23/01
WPDY968	Minneapolis, MN	3/23/96	3/23/01
WPDW652	Oakland, CA	3/26/96	3/26/01

Mobilevision, L.P.

<u>Call Sign</u>	<u>Location</u>	<u>Grant Date</u>	<u>Exp. Date</u>
WNWC592	Hammond, IN	3/21/96	3/21/01
WNRZ804	Oxon Hill, MD	3/21/96	3/21/01
WNSV846	Harvard, MA	3/22/96	3/22/01
WNSP352	Orange, CA	3/25/96	3/25/01
WNSA603	Fort Worth, TX	3/21/96	3/21/01
WNST408	Los Angeles, CA	3/22/96	3/22/01
WNSU471	San Bernardino, CA	3/21/96	3/21/01
WNVZ764	Ventura, CA	3/21/96	3/21/01
WNRZ803	San Diego, CA	3/21/96	3/21/01
WNRZ801	San Francisco, CA	3/21/96	3/21/01
WNRZ802	San Jose, CA	3/22/96	3/22/01
WNSB249	Miami, FL	3/22/96	3/22/01
WNSB245	Delray Beach, FL	3/26/96	3/26/01
WNSV850	Chicago, IL	3/21/96	3/21/01
WPFC958	Schaumburg, IL	3/21/96	3/21/01
WNWC385	Tampa, FL	3/21/96	3/21/01
WNWC563	Orlando, FL	3/21/96	3/21/01
WNSU468	St. Louis, MO	3/21/96	3/21/01
WNRZ800	Atlanta, GA	3/22/96	3/22/01
WNSV849	Phoenix, AZ	3/21/96	3/21/01
WNSD612	Houston, TX	3/21/96	3/21/01
WNSP360	Detroit, MI	3/26/96	3/26/01
WNWE252	Flint, MI	3/21/96	3/21/01

METS, Inc.
Licenses

<u>Call Sign</u>	<u>Location</u>	<u>Grant Date</u>	<u>Exp. Date</u>
WNWT832	West Palm Beach, FL	3/21/96	3/21/01
WNXS526	New Bedford, MA	3/22/96	3/22/01

Roger D. Linguist
d/b/a Location Services

<u>Call Sign</u>	<u>Location</u>	<u>Grant Date</u>	<u>Exp. Date</u>
WPFM450	Miami, FL	3/21/96	3/21/01
WPFM448	Chicago, IL	3/21/96	3/21/01
WPFM449	Boston, MA	3/21/96	3/21/01
WPFM447	Philadelphia, PA	3/21/96	3/21/01
WPFM446	New York, NY	3/21/96	3/21/01
WPFM445	Detroit, MI	3/21/96	3/21/01
WPFM443	Washington, D.C.	3/21/96	3/21/01
WPFM440	Dallas, TX	3/21/96	3/21/01
WPFM441	Los Angeles, CA	3/21/96	3/21/01
WPFM442	San Jose, CA	3/21/96	3/21/01

Uniplex Corporation
Licenses

<u>Call Sign</u>	<u>Location</u>	<u>Grant Date</u>	<u>Exp. Date</u>
WPES616	Washington, D.C.	3/21/96	3/21/01
WPES330	Charlotte, NC	3/22/96	3/22/01
WPES310	Denver, CO	3/26/96	3/26/01
WPER911	Ft. Lauderdale, FL	3/22/96	3/22/01
WPER909	West Palm Beach, FL	3/22/96	3/22/01
WPER908	Lakeland, FL	3/21/96	3/21/01
WPER907	Knoxville, TN	3/21/96	3/21/01
WPEQ751	Oklahoma City, OK	3/22/96	3/22/01
WPEQ502	San Diego, CA	3/22/96	3/22/01
WPEP663	San Jose, CA	3/21/96	3/21/01
WPEP667	Ventura, CA	3/21/96	3/21/01
WPEP659	San Francisco, CA	3/21/96	3/21/01
WPEP651	Sacramento, CA	3/21/96	3/21/01
WPEP655	Riverside, CA	3/26/96	3/26/01
WPEF609	San Antonio, TX	3/22/96	3/22/01
WPEF610	Houston, TX	3/22/96	3/22/01
WPEF612	St. Louis, MO	3/22/96	3/22/01
WPEF611	Nashville, TN	3/29/96	3/29/01
WPEF613	Kansas City, KS	3/23/96	3/23/01
WPEF614	Indianapolis, IN	3/21/96	3/21/01
WPFE421	Gainesville, FL	3/21/96	3/21/01
WPFE420	Jacksonville, FL	3/22/96	3/22/01
WPFD970	Summit, NJ	3/21/96	3/21/01
WPFD969	Hartford, CT	3/21/96	3/21/01

Uniplex Corporation (cont.)

WPF967	New Haven, CT	3/22/96	3/22/01
WPF891	Salt Lake City, UT	3/22/96	3/22/01
WPFC942	Los Angeles, CA	3/21/96	3/21/01
WPFC934	Baltimore, MD	3/22/96	3/22/01
WPFC938	Los Angeles, CA	3/21/96	3/21/01
WPFC686	Phoenix, AZ	3/22/96	3/22/01
WPFC685	San Diego, CA	4/1/96	4/1/01
WPFC684	Orlando, CA	3/22/96	3/22/01
WPEY761	Detroit, MI	3/22/96	3/22/01
WPEY760	Parma, OH	3/26/96	3/26/01
WPEX249	Milwaukee, WI	3/27/96	3/27/01
WPEW772	White Plains, NY	3/21/96	3/21/01
WPEW770	Tampa, FL	3/26/96	3/26/01
WPEW771	Central Islip, NY	3/22/96	3/22/01
WPEW769	Buffalo, NY	3/22/96	3/22/01
WPEW767	New York, NY	3/21/96	3/21/01
WPEW768	New York, NY	3/22/96	3/22/01
WPEW766	Rochester, NY	3/21/96	3/21/01
WPEW765	Albany, NY	3/22/96	3/22/01
WPEW743	Newark, NJ	3/25/96	3/25/01
WPEU561	St. Petersburg, FL	3/21/96	3/21/01
WPEU623	Miami, FL	3/21/96	3/21/01
WPET778	Boston, MA	3/22/96	3/22/01
WPET216	Fenandina Beach, FL	3/22/96	3/22/01
WPES672	Duluth, GA	3/22/96	3/22/01
WPES668	Atlanta, GA	3/22/96	3/22/01

DECLARATION OF JAMES PAUTLER

James Pautler, President and Chief Scientist of Pinpoint Communications, Inc., the parent of Pinpoint Communication Networks, Inc., (Pinpoint) declares as follows:

I have read and am familiar with the contents of the foregoing "Joint Motion for Rule Waiver." The statements of fact made therein are true and correct to the best of my knowledge. This declaration is given under pains and penalties of perjury.

Dated: May 23, 1996


James Pautler

05/23/96
RNDG:RKI:62L
10070-1

CERTIFICATE OF SERVICE

I, Diane Graham, a secretary in the law offices of ROSS & HARDIES, caused to be served via hand delivery this 23rd day of May, 1996, copies of the foregoing "Joint Motion for Rule Waiver" on the following:

Michele Farquhar
Bureau Chief, Wireless
Telecommunications Bureau
Federal Communications
Commission
Room 5002
2025 M Street, NW
Washington, DC 20554

Rosalind Allen
Deputy Chief, Wireless
Telecommunications Bureau
Federal Communications
Commission
Room 802
1919 M Street, NW
Washington, DC 20554

David Furth
Chief, Commercial Wireless
Division
Federal Communications
Commission
Room 7002
2025 Street, NW
Washington, DC 20554

Sally Janin (formerly Novak)
Special Counsel, Commercial
Wireless Division
Federal Communications
Commission
Room 7002
2025 M Street, NW
Washington, DC 20554

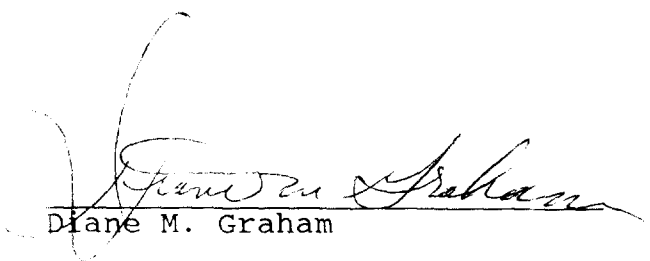
Jane Halprin
Counsel to Chief
Commercial Wireless Division
Federal Communications
Commission
Room 7002
2025 M Street, NW
Washington, DC 20554

David Siddall
Legal Advisor to Commissioner
Susan Ness
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Suzanne Toller
Legal Advisor to Commissioner
Chong
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Rudolfo Baca
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Quello
Room 802
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Jackie Chorney
Legal Advisor to the Chairman
Federal Communications
Commission
1919 M Street, NW
Room 814
Washington, DC 20554


Diane M. Graham